

Fadely, Karen

From: Silawsky, Donald [Donald.Silawsky@hq.doe.gov]
Sent: Friday, October 28, 2005 3:06 PM
To: Fadely, Karen
Subject: FW:
Attachments: SPR EIS.doc

<<SPR EIS.doc>>

KAREN: More comments! What a deluge.

DON SILAWSKY

-----Original Message-----

From: Becky Gillette
To: Donald.Silawsky@hq.doe.gov.
Sent: 10/28/2005 2:37 PM

Dear Don: Attached are comments from Sierra Club regarding the proposed SPR site in Richton. Please let me know if you need me to mail you a copy.

Thanks!

Becky

<<SPR EIS.doc>>

10/29/2005



October 28, 2005
Becky Gillette, co chair
MS Chapter Sierra Club
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Ocean Springs MS 39564
228-872-3457

Donald Silawsky
Office of Petroleum
Reserves (FE-47)
U.S. Department of Energy
1000 Independence Avenue
SW., Washington, DC 20585-0301;
(Sent by email to Donald.Silawsky@hq.doe.gov.)

Re: EIS for proposed Strategic Petroleum Reserve Expansion in Richton, Miss.

Dear Mr. Silawsky,

Recently the Mississippi Gulf Coast was hit with the largest natural disaster in our nation's history. Many people were left homeless, and even more have been coping with repairing damages to their homes, churches and businesses by the flooding and winds of Katrina. Hence, at the time that the DOE published advertisement regarding soliciting public comments (on Sept. 1, with Katrina hitting on Aug. 29) for a proposed expansion of the Strategic Petroleum Reserve (SPR) in Richton, there was no newspaper delivery in the hurricane affected areas of South Mississippi. There was no Internet access. There was no phone service. There was no electricity.

Today is the deadline for comments on this important issue, and there has been not a word about this project in the local press. Apparently DOE made absolutely no effort to inform the local media of this project. Even if they had, the focus here has been on basic essentials: getting back power, water, phone and having a roof over your head. However, if the newspapers had been contacted, I'm sure they would have written articles about this to inform the public of this proposal.

On behalf of the 1,400 members of Sierra Club in Mississippi, we request that this project be readvertised and that a public hearing be held in the most impacted community, Pascagoula, as was originally proposed prior to the hurricane. The only public hearing was held in Jackson, which is a three-hour drive from the Coast. The lack of any meaningful public participation at the meeting should be evidence enough that DOE has not done as it pledged in the Federal register notice: "DOE will conduct an open process to define the scope and content of the EIS."

There are meeting facilities in Pascagoula at the Jackson County Fairgrounds that are still operable after Katrina.

There was also no public hearing in Hattiesburg, which is the largest city located near Richton. Hattiesburg residents in the past have turned out in mass to oppose projects that would negatively impact the Leaf River. They have had no opportunity to comment on impacts in the Richton\Hattiesburg area.

In addition to this major disaster impacting the ability of citizens to have input, the storm also put intense pressure on regulatory agencies such as the U.S. Army Corps of Engineers and the Mississippi Department of Marine Resources. This could have limited their ability to provide scoping comments on the project.

Here, in brief, are issues the need to be studied in the scoping:

1. How will the withdrawal of huge quantities of water from the Leaf River affect endangered species including the Gulf sturgeon, the Alabama red-bellied turtle and the ringed map turtle? Many sturgeons were killed after Katrina caused such poor water quality, and it is likely other endangered species were also heavily impacted by this huge hurricane.

2. The endangered Louisiana black bear has been sighted several times recently in Vancleave, which is within the pipeline route. How would two pipelines in this area impact the black bear?

3. The DOE must consider the impact of currently permitted projects such as a \$48 million pipeline from the Pascagoula River. This classic pork barrel project that would withdraw millions of gallons of water per day is being paid for by the taxpayers even though there are no current customers. However, the pipeline is being extended to the Naval Homeport Pascagoula and water expected to be used for the private redevelopment of Singing River Island when ownership is returned after the base is closed. Some private companies have expressed interest in siting an oil refinery on the island. There has been no EIS on this project, and not even a Corps of Engineers public notice, but information can be obtained from the Jackson County Board of Supervisors or EPA (which is funding the project through a special Congressional appropriation).

4. The DOE should consider the cumulative impacts of this project on top of major ecological damage from Hurricane Katrina. Huge amount of debris and trash were

swept into the Mississippi Sound and the Gulf of Mexico when the storm surge retreated. It will take years for this trash to be removed. Also, because of the massive quantities of debris on land, stormwater runoff will be extremely polluted for years to come.

5. The DOE must consider cumulative and secondary impacts of this project in light of the current proposals to build two onshore (Chevron Bayou Cassotte and Clean Energy) and one offshore (Compass Port) LNG facilities which would require major dredging, increase air pollution in the area, greatly increase safety risks from terrorism or accidents, and put large portions of the waterways off limits to boaters and fishermen while LNG ships are in transit.

6. Chevron Pascagoula Refinery was recently granted a permit to expand production, which will increase air pollution. The Gulf Coast is on the borderline with attainment of ozone standards, and has been given an "F" by the American Lung Association for air quality. Currently massive quantities of storm debris are being burned in open pits. The EIS needs to consider how additional air pollution with the port related infrastructure needed to serve the SPR would impact air quality in Jackson County.

7. Socioeconomics. About a third of the housing stock in Jackson County has been destroyed. Jerry St. Pe, chairman of the Jackson County Economic Development Foundation, says that currently a third of the workers at local shipyards aren't able to work because they don't have a place to live. There is a major shortage of workers expected to continue for a long time because of the time it will take 10 to 15 years to build back all the homes that were lost. This pipeline construction project would compete with other existing, well established industries for workers and housing. That could have a net long term negative impact on defense contracting. Mr. St. Pe was quoted in the newspaper as saying the worker and housing shortage issue could negatively impact the ability of businesses in the area to attract defense contracts that have been the backbone of this county's economy.

8. Environment justice. Regarding human health impacts, Jackson County is already in the top 20 percent of toxic releases in the U.S., and the top 20 percent most polluted counties. That was before the current expansion. There are many residents of the county who are low income, including minorities, and that situation has gotten worse since the storm destroyed many homes. The DOE should consider whether it will be environmental injustice to make low-income communities that are struggling to recover from Katrina have to accept yet another risk and more pollution in order to serve the energy demands for wealthier states on the eastern seaboard who wouldn't allow facilities such as LNG ports in their cities.

9. Disposal of brine at sea could negatively impact areas designed as Essential Fish Habitat under the Magnuson-Stevens fisheries act.

10. An issue which crosses the lines of socioeconomic and environmental justice is how this project would impact commercial fishermen. Many lost their boats in Hurricane Katrina, and fishing, shrimping and oystering are expected to be curtailed

greatly for a couple of years. Any more adverse marine impacts could exacerbate this problem.

11. DOE should consult with oyster biologist Dr. Ed Cake, [REDACTED], who has a lot of knowledge about the impacts of pipeline construction on oyster habitat. DOE should also consult with Dr. Cake or another oyster biologist regarding the detrimental impacts of increased salinity on oysters. Increased salinity makes oysters more susceptible to parasites.

The scoping hearing should also be re-advertised because of the paucity of information about issue such as the routes of the two proposed pipelines, the amount of daily water withdrawals from the Leaf River, and the areas of the Gulf of Mexico proposed for dispersal of the brine.

Sincerely,

Becky Gillette, co chair
Mississippi Chapter Sierra Club
(sent by electronic transmission)